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March 14, 2024

Christie Harr  
676 Reed Avenue  
Monessen, PA 15062

RE: Waiver of Service of Summons on Barb Lyle in Harr v. WAHS, et al.  
C.A. No. 2:21-cv-01560  
Our File No. 52440.425905

Dear Ms. Harr:

On February 29, 2024, at the offices of Washington Area Humane Society, the U.S. Postal Service delivered three (3) Priority Mail envelopes sent by you. These envelopes contained documents with regard to your pending lawsuit in federal court.

This is to inform you that two of the envelopes that you sent to WAHS are directed to persons who are no longer employed by the agency, namely, Chelsea Fleegal (who you incorrectly identified as "Chelsei Fleega") and Maranda Coombs. I am advising you by this letter that your forwarding of correspondence to these two individuals at the Washington Area Humane Society is improper as they are no longer employed at the agency. As such, any further attempts by you to communicate with my client, WAHS, in regard to these two individuals will be the subject of a separate motion to the court.

In addition, our firm and the undersigned also represent Ms. Fleegal and Ms. Coombs, and will represent them formally in the court should you somehow succeed in attempting service on them by other means.

With regard to the other individual, Barb Lyle, for whom WAHS received a separate United States Postal Service Priority Mail envelope on February 29, 2024, Ms. Lyle is still employed by the agency. As such, I am returning to you the "Waiver of Service of Summons" form on behalf of Ms. Lyle, completed and signed by me on her behalf. However, I am also advising you by this letter that if you continue with your prosecution of this case against Ms. Lyle, or any of the other clients that our firm represents, and/or Ms. Fleegal or Ms. Coombs, who we also will represent, and your case results in the termination of this litigation in favor of my clients, we intend to pursue all legal avenues of recourse against you to recover attorney's fees, costs and defenses for this wholly frivolous lawsuit you continue to press with the court.

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My clients and our firm will also consider any other separate legal remedies available to them with regard to your action in this case. As you know, my client and all the other defendants filed Motions to Dismiss your Corrected Amended Complaint, which motions are still pending before the court even though they were filed 11 months ago.

There will not be any offer of settlement by or on behalf of my clients to you, under any circumstances for this case, if that is what you are thinking.

Very truly yours,



Robert J. Marino

RJM/lh  
Enclosure

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